COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Southwest Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Vaughan Furniture Company
E.C. Dodson Plant
Galax, Virginia
Permit No. SWRO11008

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Vaughan Furniture Company has applied for a Title V Operating Permit for its E.C. Dodson Plant located at 47 Poplar Knob Road, Galax, Virginia. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Deputy Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee
Vaughan Furniture Company
E.C. Dodson Plant
47 Poplar Knob Road
P.O. Box 1489
Galax, VA 24333

AFS ID No. 51-640-00058

SOURCE DESCRIPTION

SIC Code: 2511 – Wood Household Furniture, Except Upholstered.

The E.C. Dodson plant is located at 47 Poplar Knob Road in Galax, Virginia. The facility, which occupies approximately 12.5 acres in an industrial/residential setting, manufactures wood furniture consisting primarily of case goods (SIC 2511).

Raw lumber is dried in kilns, where the moisture content is reduced to approximately 8 percent. There are a total of four dry kilns on-site, each with a capacity of 55,000 board feet. A full kiln of wood can be dried in approximately two weeks. Steam from the boilers is used to heat the kilns.

The dried lumber enters the rough end machining operations where it is cut to the desired dimensions. Scrap wood is conveyed to a hog where it is reduced in size and conveyed to the wood silo. The dimensioned wood passes through a variety of sanding operations before assembly.

Four baghouses make up the wood dust collection system which removes wood dust and chips from the various processing operations. The collected woodwaste is used as fuel for the boilers.

Gluing operations occur throughout the manufacturing process. They include the gluing of lumber together with chipboard or plywood, the veneering of panels, the rimming and edging of panels, gluing of various laminates, the assembly, and the repair of furniture. The various glues are applied with brushes, spray guns, bottles, cold presses, roll coaters, and hot presses.

After the wood components are assembled, they are transported to the finishing operations. The finishing of wood furniture is a multi-step process that involves the application of many layers of finishing materials to achieve the desired appearance. The various finishes can be applied by brushing, spraying, flat line printing, roll coating, silkscreen printing, stenciling, dipping, curtain coating, rubbing, etc. At the E. C. Dodson facility, finishing materials are applied in 12 spray booths using both high volume/low pressure (HVLP) and airless spray guns. Materials applied include: fillers, edge fillers, wood preservatives, stains, toners, glazes, washcoats, and top coats such as sealers and lacquers. Finishing operations also include the drying and curing of the finish, which is done by air drying (flash-off area) and heat (ovens). Finishing operations also include the stripping (wash-off) and repairing of furniture and parts. Minor finish repairs are frequently made with spray cans at various locations throughout the plant.

After all of the finishes are applied, the furniture goes through final inspection, packing, and is stored in the warehouse prior to shipment to the customer.

The E.C. Dodson plant is a Title V major source of VOC, methyl alcohol, methyl ethyl ketone, naphthalene, cumene, ethyl benzene, ethylene glycol, methyl isobutyl ketone, toluene, xylene, glycol ethers, and total hazardous air pollutant (HAP) emissions. The source is located in an attainment area for all criteria pollutants. The facility is permitted under a New Source Review (NSR) permit issued October 16, 2002.

COMPLIANCE STATUS

The facility is inspected at least once each year and the last formal inspection was conducted on May 8, 2003. The source was found to be in compliance with all applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Boilers
There are three boilers on-site, two of which have a rated heat input of 28 x 10^6 Btu/hr, and fire both wood waste and coal. The third boiler has a rated heat input of 10.46 x 10^6 Btu/hr, fires No. 2 fuel oil and is used only as an emergency backup. Steam produced by the boilers is used to heat the dry kilns and the drying ovens in the finishing operations. Both of the wood/coal-fired boilers utilize two multi-cyclone collectors in series to control particulate emissions. The coal and wood fuels are stored in silos.

Woodworking
The woodwaste generated from the various sawing, planing, and sanding operations is controlled by a dust collection system consisting of four baghouses. The collected woodwaste is used as boiler fuel.

Gluing Operations
The wood furniture gluing operations occur throughout the manufacturing process. Gluing operations include attaching chipboard and plywood to lumber, the veneering of panels, the rimming and edging of panels, gluing of various laminates, the assembly, and the repair of furniture. The glues are applied with brushes, spray guns, bottles, cold presses, roll coaters, and hot presses. Some of the glues do emit VOC's, but there are no control devices in place to capture these pollutants.

Finishing Operations
Many different finishing materials are applied to the furniture surfaces to achieve the desired appearance. These finishes are applied by brushing, spraying, flat line printing, roll coating, silkscreen printing, stenciling, dipping, curtain coating, rubbing, etc. Finishing materials are applied in twelve (12) spray booths using both high volume/low pressure (HVLP) and airless spray guns. Materials applied include: fillers, wood preservatives, stains, toners, glazes, washcoats, and top coats such as sealers, and lacquers. Air drying (flash-off) and heat (ovens) are used to dry and cure the finish. Finishing operations also include the stripping (wash-off) and repairing of furniture and parts. Minor finish repairs are made with spray cans at various locations throughout the plant.

Emissions from finishing operations include particulate (PM/PM_{10}), VOC, and HAP's. Water pan or dry filters are utilized in each of the spray booths to control particulate emissions from overspray. There are no control devices to reduce the emissions of VOC or volatile HAP.

EMISSIONS INVENTORY

The 2002 annual emissions are summarized in the following table:

2002 Criteria Pollutant Emissions (Plantwide Total)	
Pollutant	Tons Emitted
PM_{10}	7.55
VOC	151.39
NO_X	19.55
SO_2	0.91
CO	22.04

EMISSION UNIT APPLICABLE REQUIREMENTS

Boilers

Bigelow Type B Wood/Coal-Fired Boiler (B1)
Cleaver Brooks Distillate Oil-Fired Boiler (B2)
English Spreader Stoker Wood/Coal-Fired Boiler (B3)

Limitations: The following limitations are State BACT requirements from Conditions 6, 7, 13, 14, 15, 18, 19, 22, 23, and 24 of the NSR permit issued October 16,2002:

- Condition 6 requires that PM emissions from the Bigelow boiler (B1) be controlled by two Barron multicyclones in series, or equivalent. The Barron multicyclones shall be provided with adequate access for inspection.
- Condition 7 requires that PM emissions from the English spreader stoker wood/coal-fired boiler (B3) be controlled by two multicyclones in series, or equivalent. The multicyclones shall be provided with adequate access for inspection and shall be inspected annual to insure structural integrity.
- Condition 13 limits annual fuel consumption in the Bigelow boiler (B1) to 3,328 tons of woodwaste and 850 tons of coal, calculated as the sum of each consecutive 12 month period.
- Condition 14 limits annual fuel consumption in the English spreader stoker boiler (B3) to 6,000 tons of woodwaste and 800 tons of coal, calculated as the sum of each consecutive 12 month period.
- Condition 15 specifies that the English spreader stoker boiler (B3) is to be operated in compliance with the federal emission requirements under 40 CFR 60, Subpart Dc
- Condition 18 limits emissions from the Bigelow boiler (B1) to the following:

Pollutant	Lbs./mmBtu	Lbs./hr	Tons/yr
PM	0.30		13.09
PM_{10}		8.11	10.51
SO_2	1.20		14.37

Pollutant	Lbs./mmBtu	Lbs./hr	Tons/yr
NO_X (as NO_2)		14.56	19.00
CO		23.80	24.76

- Condition 19 limits emissions from the English spreader stoker boiler (B3) to the following:

Pollutant	Lbs./mmBtu	Lbs./hr	Tons/yr
PM	0.30		19.20
PM_{10}		8.11	16.08
SO_2	1.20		14.27
VOC		0.49	0.85
NO_X (as NO_2)		14.56	29.12
CO		23.80	42.80

- Condition 22 limits visible emissions from the Bigelow boiler (B1) exhaust and the English spreader stoker boiler (B3) exhaust to 20 percent opacity except during one six-minute period in which the opacity shall not exceed 27 percent, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except startup, shutdown, or malfunction.
- 9 VAC 5-50-80 limits visible emissions from the Cleaver Brooks distillate oil-fired boiler (B2) exhaust to 20 percent opacity except during one six-minute period in which the opacity shall not exceed 30 percent, as determined by EPA Method 9 (per 9 VAC 5-50-20A.2). 9 VAC 5-50-20A.3 stipulates that this condition applies at all times except startup, shutdown, or malfunction.
- Condition 23 specifies that the approved fuels for the Bigelow (B1) and English spreader stoker (B3) boilers are bituminous coal (backup) and woodwaste (primary), excluding any wood which contains chemical treatments or has affixed thereto paint and/or finishing materials or paper or plastic laminates. The use of other fuels may require a permit to modify and operate.
- Condition 24 limits the sulfur content of the coal to be burned in the boilers (B1 and B3) to not more than 0.86 percent by weight per shipment.

Monitoring & Recordkeeping:

As required in Condition 24 of the NSR Permit issued October 16, 2002, the Vaughan Furniture Company will maintain records of all coal shipments purchased, indicating the name of the coal supplier, sulfur, moisture, Btu and ash content per shipment. The records shall also indicate the methods used in the coal analysis, the location of the coal when sampled, and the amount of coal burned per day. These records are to be available on site for inspection and shall be kept on file for the most current five year period.

Condition 25.c requires that records of the daily, monthly, and annual tons of wood and coal combusted in the spreader stoker boiler be maintained on site.

The following emission factors will be used to show compliance with the emission limits listed in conditions 18 and 19 of NSR permit issued on October 16, 2002:

Regulated Pollutant	Controlled Emission Factors	
	Wood Combustion (lb/ton)	Coal Combustion (lb/ton)
PM	4.8	5.94
PM_{10}	4.32	5.94
SO_2	0.4	38 * S%
NO_X	7.84	14
CO	13.6	5
VOC	0.278	0.05

The wood combustion emissions factors were obtained from AP-42 Tables 1.6-1, 1.6-2, and 1.6-3. The coal combustion emission factors were obtained from AP-42, Tables 1.1-3, 1.1-4, and 1.1-14.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 37 of the NSR permit issued on October 16, 2002 requires that Vaughan Furniture Company notify the DEQ SWRO director within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, Vaughan Furniture Company shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Streamlined Requirements:

There are no streamlined requirements for the boilers.

Dry Kilns (DK1, DK2, DK3, & DK4)

Limitations:

The combined throughput of raw lumber in the four dry kilns (DK1, DK2, DK3, & DK4) is limited to 5,802,632 board feet per year. This is a State BACT requirement from Condition 12 of the NSR Permit issued on October 16, 2002.

Monitoring & Recordkeeping:

Condition 25 of the October 16, 2002 NSR permit requires that Vaughan Furniture Company maintain records of all emission data and operating parameters necessary to demonstrate compliance with the permit. These records are to include the monthly and annual raw lumber throughput in the four dry kilns (DK1, DK2, DK3, & DK4). Compliance with the 20% opacity limit will be demonstrated by weekly opacity checks.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 37 of the NSR Permit issued on October 16, 2002 requires that the permittee notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, Vaughan Furniture must provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Streamlined Requirements:

There are no streamlined requirements for the dry kilns.

Woodworking (W1)

Limitations:

The following limitations are State BACT requirements from Conditions 8, 9, 11, 12, 20, and 21 of the NSR Permit issued on October 16, 2002:

- Condition 8 requires that particulate emissions from the woodworking operations (W1) at the facility be controlled by two Carter-Day (CD-BH1 & CD-BH2) and two Torit-Day (TD-BH3 & TD-BH4) fabric filters.
- Condition 9 requires that particulate emissions from the pneumatic loadout of woodwaste into trucks be controlled by fabric filters installed on the truck trailer vents, or equivalent.
- Condition 11 limits the throughput of raw lumber at the facility to 8,000,000 board feet per year.
- Condition 20 limits the particulate emissions (PM/PM_{10}) from the woodworking operations at the facility, as a combined total exhausted from the four baghouses (CD-BH1, CD-BH2, TD-BH3 & TD-BH4), to 0.01 grains/dscf (per unit) and 4.20 tons/yr.
- Condition 21 limits visible emissions from each baghouse exhaust (CD-BH1, CD-BH2, TD-BH3 & TD-BH4) to 5% opacity as determined by EPA Method 9.

Monitoring & Recordkeeping:

As required in Condition 25 of the NSR permit issued October 16, 2002, Vaughan Furniture Company shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the NSR permit. These records shall include a monthly and annual material balance including the throughput and emissions of particulate matter.

The particulate emission limits in the NSR permit for the baghouses (CD-BH1, CD-BH2, TD-BH3 & TD-BH4) were calculated based on:

(1) dry lumber density of 3.5 lb/board foot;
(2) 60% of the total weight of lumber throughput being woodwaste;
(3) 95% of the total woodwaste having a particle size larger than 100 µm (i.e., larger than PM); and
(4) each baghouse having a particulate control efficiency of 99%.

Compliance with the particulate emission and opacity limits will be demonstrated by weekly opacity checks and emission calculations based on 5% of the total woodwaste collected being PM/PM_{10} and a baghouse particulate control efficiency of 99%.

Condition 38 of the NSR permit issued October 16, 2002 requires the permittee to develop a maintenance schedule for the control equipment and maintain records of all scheduled and non-scheduled maintenance, as well as maintain an inventory of spare parts to minimize the duration of control equipment breakdowns.

Condition 39 of the NSR permit issued October 16, 2002 requires proper operation and maintenance of pollution control equipment. The permittee is to have available written operating procedures for the air pollution control equipment and operators are to be trained in the proper operation of the units. The permittee is to maintain records of training provided, including names of trainees and the date and nature of the training.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 37 of the NSR Permit issued on October 16, 2002 requires that the permittee notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, Vaughan Furniture must provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Streamlined Requirements:

There are no streamlined requirements for the woodworking operations.

Gluing Operations (G1)

Limitations:

There are applicable requirements for the adhesives and gluing operations in conditions 17 and 27 of the NSR permit issued October 16, 2002:

- **!** Condition 17 limits VOC emissions from the plantwide use of all adhesives and glues to 1.38 lbs./hr and 0.85 tons/yr.
- **!** Condition 27.c is a MACT requirement that limits the VHAP content of contact adhesives.

Monitoring & Recordkeeping:

As required in Condition 25 of the NSR permit issued October 16, 2002, Vaughan Furniture Company shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the NSR permit. These records shall include a monthly and annual material balance including the throughput and emissions of VOC. Hourly throughput and emissions shall be calculated by dividing the daily throughput by the corresponding hours of operation.

Conditions 31.c and 32.a of the October 16, 2002 NSR permit are MACT requirements to: (1) prepare and maintain an inspection & maintenance plan to include adhesive transfer and

application equipment; and, (2) maintain certified product data sheets as well as VHAP and solids content information on the adhesives.

Compliance with the adhesive VOC emission limits (Condition 17 of the October 16, 2002 NSR permit) will be demonstrated through these recordkeeping requirements

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 28.d of the NSR permit issued on October 16, 2002, is a MACT requirement to submit a compliance certification, with the semiannual report, when compliant adhesives are being used to show initial compliance.

Condition 37 of the NSR permit issued on October 16, 2002 requires that the permittee notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, Vaughan Furniture must provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Streamlined Requirements:

There are no streamlined requirements for the gluing operations.

Finishing Operations (F1)

Limitations:

The NSR permit issued October 16, 2002 contains State BACT requirements in Conditions 3, 4, 5, 16, and 21. MACT JJ conditions are contained in Conditions 26 through 34.

- Condition 3 requires that particulate emissions from the Greenline Corporation furniture finishing spray booth be controlled by fabric filters, or equivalent.
- Condition 4 requires that particulate emissions from the base coat furniture finishing spray booth be controlled by metal louvers, or equivalent.
- Condition 5 requires that particulate emissions from the eight George Koch paint spray booths be controlled by water pan filter systems, fabric filters, or equivalent.
- Condition 16 limits the particulate and VOC emissions from the coating operations at the facility, to the following values:

Pollutant	Lbs./hr	Tons/yr
PM/PM_{10}	4.00	4.0
VOC	938.02	332.3

- Condition 21 limits visible emissions from each spray booth and dryer exhaust to 5% opacity.
- Conditions 26 – 34 are MACT requirements which include emission standards and work practice standards, as well as requirements for compliance demonstration, operation and maintenance, recordkeeping, notification, and reporting.

Monitoring & Recordkeeping:

As required in Condition 25 of the NSR permit issued October 16, 2002, Vaughan Furniture Company shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the NSR permit. These records shall include a monthly and annual material balance including the throughput and emissions of VOC, particulate matter, and PM_{10}. Condition 25.b. also requires that records of the hours of operation of the finishing spray booths be maintained.

Condition 32 of the NSR permit contains MACT recordkeeping requirements.

Compliance with the 5% opacity limit will be demonstrated by weekly opacity checks.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 37 of the NSR permit issued October 16, 2002 requires that the permittee notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, Vaughan Furniture must provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Conditions 33 and 34 of the NSR permit contain MACT compliance notification and reporting requirements.

Streamlined Requirements:

There are no streamlined requirements for the finishing operations.

FACILITY-WIDE REQUIREMENTS

Limitations:

- Condition 10 of the NSR permit issued October 16, 2002 requires that the facility be constructed so as to allow emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at appropriate locations.
- Visible Emissions: (9 VAC 5-50-80 - Standard for Visible Emissions) No owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any hour of not more than 30% opacity. Failure to meet these requirements due to the presence of water vapor shall not be seen as a violation.

Monitoring & Recordkeeping:

9 VAC 5-50-50 and 9 VAC 5-80-110 require that records of all emissions data and operating parameters necessary to demonstrate compliance with the permit, be maintained.

Testing:

The permit does not require facility-wide source testing. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 37 of the NSR permit dated October 16, 2002 requires that the DEQ Director be notified within four business hours if the permitted facility or related air pollution control equipment causes excess emissions for more than one hour. The owner shall provide a written statement within 14 days explaining the problem, corrective actions taken, and the estimated duration of the malfunction.

Streamlined Requirements:

There are no facility-wide streamlined requirements.

GENERAL CONDITIONS

The source is subject to the provisions of 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT). All applicable limitations from the Wood Furniture MACT have been included in the permit. The permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Applicable limitations from the general provisions have also been included in the permit. The MACT requirements are contained in Conditions 26 through 34 of the October 16, 2002 NSR permit.

The Title V permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§2.1-20.01:2 and §§10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2001".

This general condition cites 9 VAC 5-20-180 (Facility and Control Equipment Maintenance or Malfunction).

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emissions reporting within 4 hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to 9 VAC 5-80-180 including Title V facilities. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four day time business hours after discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on General Condition F.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition cites the regulatory sections of 9 VAC 5-60-70 (Designated Emissions Standards).

STATE-ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Code has specific requirements only enforceable by the State and have not been included in the Federal Operating Permit:

9 VAC 5-40-340, Standard for odor;
9 VAC 5-60-200, et.seq., Emission Standards for Toxic Pollutants from Existing Sources (Rule 6-4); and
9 VAC 5-60-320, et.seq., Emission Standards for Toxic Pollutants from New and Modified Sources (Rule 6-5)

The state-only enforceable toxic conditions (43 through 45) from the October 16, 2002 NSR permit will not be included in the Title V permit since the conditions are not federally enforceable and the NSR permit will not be superceded by the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

There are currently no known future applicable requirements for this facility. A future MACT has been proposed for industrial boilers and is expected to have an impact on this source. This MACT has not yet been promulgated. Therefore, no future applicable requirements have been included in the permit at this time.

INAPPLICABLE REQUIREMENTS

The provisions of 9 VAC 5-40-300 (Standard for Volatile Organic Compounds) and 9 VAC 5-40-310 (Standard for Nitrogen Oxides) are not appropriate since the E.C. Dodson Plant is not located in the Northern Virginia Emissions Control Area.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Pollutant Emitted (5-80-720 B.)
S1	Wood Silo w/ no external vents (Boiler Fuel)	PM_{10}
S2	Coal Silo w/ no external vents (Boiler Fuel)	PM_{10}
The citation criteria for each of the insignificant activities is 9 VAC 5-80-720B – Insignificant due to emission levels.		

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are available for public review.

PUBLIC PARTICIPATION

A public notice appeared in The Galax Gazette on Wednesday, August 6, 2003 announcing a 30-day public comment period for this permit. The public comment period extended through September 5, 2003. Notice was also provided to North Carolina, Tennessee, and West Virginia as affected states. No comments or hearing requests were received.